



## Service of Process Transmittal

03/05/2018

CT Log Number 532907093

**TO:** Shelley Alleyne  
Pricewaterhouse Coopers  
PriceWaterhouse Coopers Center, 300 Madison Avenue  
New York, NY 10017

**RE: Process Served in South Carolina**

**FOR:** PricewaterhouseCoopers LLP (Domestic State: DE)  
*According to our records representation services for this entity have been discontinued in this jurisdiction.*

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Shannon Ashford, Pltf. vs. PricewaterhouseCoopers LLP, Dft.

**DOCUMENT(S) SERVED:** Cover Sheet, Summons, Complaint

**COURT/AGENCY:** Richland County Court of Common Pleas, SC  
Case # 2017CP4007226

**NATURE OF ACTION:** Employee Litigation - Discrimination

**ON WHOM PROCESS WAS SERVED:** CT Corporation System, Columbia, SC

**DATE AND HOUR OF SERVICE:** By Certified Mail on 03/05/2018 postmarked on 03/03/2018

**JURISDICTION SERVED :** South Carolina

**APPEARANCE OR ANSWER DUE:** within 30 days after the service hereof, exclusive of the day of such service

**ATTORNEY(S) / SENDER(S):** Shannon Ashford  
22 New Holland Circle  
Columbia, SC 29203  
857-753-0539

**ACTION ITEMS:** CT has retained the current log, Retain Date: 03/06/2018, Expected Purge Date: 03/11/2018

Image SOP

Email Notification, Patrice Edmonds patrice.edmonds@us.pwc.com

Email Notification, Ivan P. Stolze ivan.p.stolze@us.pwc.com

Email Notification, Shelley Alleyne shelly.alleyne@us.pwc.com

**SIGNED:** CT Corporation System

**ADDRESS:** 2 Office Park Court  
Suite 103  
Columbia, SC 29223

**TELEPHONE:** 804-217-7255



CT CORPORATION SYSTEM  
2 OFFICE PARK COURT  
SUITE 103  
COLUMBIA, SC 29223

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Shannon Ashford

Plaintiff(s)

vs.

Pricewaterhousecoopers, LLP

Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2017-CP - 40- 07226

Submitted By: Shannon Ashford  
 Address: 22 New Holland Circle  
 Columbia, South Carolina 29203

SC Bar #:  
 Telephone #: 803-754-8145  
 Fax #:  
 Other:  
 E-mail: sashford@stanfordalumni.org

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

## DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.  
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☒ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

## NATURE OF ACTION (Check One Box Below)

- |   |  |   |  |
|---|--|---|--|
| <b>Contracts</b><br><input type="checkbox"/> Constructions (100)<br><input type="checkbox"/> Debt Collection (110)<br><input checked="" type="checkbox"/> Employment (120)<br><input type="checkbox"/> General (130)<br><input type="checkbox"/> Breach of Contract (140)<br><input type="checkbox"/> Other (199) | <b>Torts - Professional Malpractice</b><br><input type="checkbox"/> Dental Malpractice (200)<br><input type="checkbox"/> Legal Malpractice (210)<br><input type="checkbox"/> Medical Malpractice (220)<br>Previous Notice of Intent Case #<br>20 -CP- -<br><input type="checkbox"/> Notice/ File Med Mal (230)<br><input type="checkbox"/> Other (299)   | <b>Torts - Personal Injury</b><br><input type="checkbox"/> Assault/Slander/Libel (300)<br><input type="checkbox"/> Conversion (310)<br><input type="checkbox"/> Motor Vehicle Accident (320)<br><input type="checkbox"/> Premises Liability (330)<br><input type="checkbox"/> Products Liability (340)<br><input type="checkbox"/> Personal Injury (350)<br><input type="checkbox"/> Wrongful Death (360)<br><input type="checkbox"/> Other (399)   | <b>Real Property</b><br><input type="checkbox"/> Claim & Delivery (400)<br><input type="checkbox"/> Condemnation (410)<br><input type="checkbox"/> Foreclosure (420)<br><input type="checkbox"/> Mechanic's Lien (430)<br><input type="checkbox"/> Partition (440)<br><input type="checkbox"/> Possession (450)<br><input type="checkbox"/> Building Code Violation (460)<br><input type="checkbox"/> Other (499)  |
| <b>Inmate Petitions</b><br><input type="checkbox"/> PCR (500)<br><input type="checkbox"/> Mandamus (520)<br><input type="checkbox"/> Habeas Corpus (530)<br><input type="checkbox"/> Other (599)  | <b>Administrative Law/Relief</b><br><input type="checkbox"/> Reinstate Drv. License (800)<br><input type="checkbox"/> Judicial Review (810)<br><input type="checkbox"/> Relief (820)<br><input type="checkbox"/> Permanent Injunction (830)<br><input type="checkbox"/> Forfeiture-Petition (840)<br><input type="checkbox"/> Forfeiture-Consent Order (850)<br><input type="checkbox"/> Other (899) | <b>Judgments/Settlements</b><br><input type="checkbox"/> Death Settlement (700)<br><input type="checkbox"/> Foreign Judgment (710)<br><input type="checkbox"/> Magistrate's Judgment (720)<br><input type="checkbox"/> Minor Settlement (730)<br><input type="checkbox"/> Transcript Judgment (740)<br><input type="checkbox"/> Lis Pendens (750)<br><input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)<br><input type="checkbox"/> Confession of Judgment (770)<br><input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)<br><input type="checkbox"/> Other (799) | <b>Appeals</b><br><input type="checkbox"/> Arbitration (900)<br><input type="checkbox"/> Magistrate-Civil (910)<br><input type="checkbox"/> Magistrate-Criminal (920)<br><input type="checkbox"/> Municipal (930)<br><input type="checkbox"/> Probate Court (940)<br><input type="checkbox"/> SCDOT (950)<br><input type="checkbox"/> Worker's Comp (960)<br><input type="checkbox"/> Zoning Board (970)<br><input type="checkbox"/> Public Service Comm. (990)<br><input type="checkbox"/> Employment Security Comm (991)<br><input type="checkbox"/> Other (999) |
| <b>Special/Complex /Other</b><br><input type="checkbox"/> Environmental (600)<br><input type="checkbox"/> Automobile Arb. (610)<br><input type="checkbox"/> Medical (620)<br><input type="checkbox"/> Other (699)   | <input type="checkbox"/> Pharmaceuticals (630)<br><input type="checkbox"/> Unfair Trade Practices (640)<br><input type="checkbox"/> Out-of-State Depositions (650)<br><input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660)<br><input type="checkbox"/> Sexual Predator (510)   |   |  |

Submitting Party Signature: 

Date:

11/29/2017

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

**FOR MANDATED ADR COUNTIES ONLY**

Allendale, Anderson, Beaufort, Clarendon, Colleton, Florence, Greenville, Hampton, Horry, Jasper, Lee, Lexington, Pickens (Family Court Only), Richland, Sumter, Union, Williamsburg, and York

**SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.**

**You are required to take the following action(s):**

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210<sup>th</sup> day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs. (Medical malpractice mediation is mandatory statewide.)
4. Cases are exempt from ADR only upon the following grounds:
  - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
  - b. Requests for temporary relief;
  - c. Appeals
  - d. Post Conviction relief matters;
  - e. Contempt of Court proceedings;
  - f. Forfeiture proceedings brought by governmental entities;
  - g. Mortgage foreclosures; and
  - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

**Please Note: You must comply with the Supreme Court Rules regarding ADR.  
Failure to do so may affect your case or may result in sanctions.**

STATE OF SOUTH CAROLINA )

COUNTY OF RICHLAND )

IN THE COURT OF COMMON PLEAS  
FIFTH JUDICIAL CIRCUIT

Shannon Ashford,  
Plaintiff, )

vs. )

Pricewaterhousecoopers, LLP  
Defendant/s. )

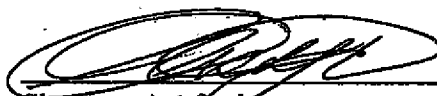
Civil Action No.: 2017 CP 40 \_\_\_\_\_

**SUMMONS & COMPLAINT  
(JURY TRIAL DEMANDED)**

RICHLAND COUNTY  
FILED  
2017 NOV 29 PM 3:50  
JANETTE W. MCBRIDE  
C.C.P. & G.S.

**YOU ARE HEREBY SUMMONED** and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to said Complaint upon the subscriber at her Home (Shannon Ashford, 22 New Holland Circle, Columbia, South Carolina 29203) within 30 days after the service hereof, exclusive of the day of such service, and if you fail to answer within the prescribed time, a judgment by default will be rendered against you for the amount or other remedy requested in the attached Complaint plus interest and costs.

**Shannon Ashford**



Shannon Ashford  
22 New Holland Circle  
Columbia, SC 29203

November 29, 2017

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )

IN THE COURT OF COMMON PLEAS  
FIFTH JUDICIAL CIRCUIT

Shannon Ashford, )  
Plaintiff, )

Civil Action No.: 2017 CP 40

vs. )

**COMPLAINT  
(JURY TRIAL DEMAND)**

Pricewaterhousecoopers, LLP )  
Defendant/s. )

RICHLAND COUNTY  
FILED  
2017 NOV 29 PM 3:50  
JEANETTE W. MCBRIDE  
CLERK P. & G.S.

Plaintiff, for her Complaint against Defendant, avers as follows:

### **INTRODUCTION**

1. This is a complaint authorized and instituted pursuant to the Federal Civil Rights Act of 1964, as amended (herein "Title VII"), 42 U. S. C. §2000 *et. seq.*.

### **PARTIES**

2. Plaintiff is an African American citizen of the United States and, at all times relevant herein, was a resident of the County of Richland, State of South Carolina.
3. Upon information and belief, Pricewaterhousecoopers, LLP. (Hereinafter PWC or Defendant) is a legal entity doing business in South Carolina organized in one of the United States.
4. Upon information and belief, Defendant employs/employed (during the relevant period) in excess of 500 employees.

### **JURISDICTION AND VENUE**

5. The unlawful conduct alleged in this Complaint was committed in Richland County, South Carolina.
6. Plaintiff has satisfied all agency, administrative and judicial prerequisites to the institution of this action.

7. Subject matter jurisdiction is proper in this Court under the following statutes: Section 15-7-10 et seq. (As amended) the Code of Laws for South Carolina and relevant case law. 42 U. S. C. §2000 (e), et. seq. (5 USCA §706) and relevant case law.

### ***FACTUAL BACKGROUND***

8. Plaintiff was hired by Defendant in or about April of 2015. She worked in the Columbia office and performed to or beyond the legitimate expectations of her employer, Defendant.
9. In or about October of 2015, Plaintiff informed management of her concerns about discrimination.
10. In June of 2016, she became eligible for but was denied a general promotion. Further, her annual evaluation was inconsistent and not consistent with her performance, work product or effort. Based on statements, demeanor and other observations, Plaintiff became further concerned that she was being treated differently and negatively by her immediate management.
11. In July of 2016, she applied for a position/opportunity, for which she was well qualified and such position went to, upon information and belief, a less qualified white candidate.
12. In September of 2016 she again applied for a position for which she was well qualified and still has not received an answer regarding this position.
13. In March of 2017, Plaintiff applied for Senior Associate (Healthcare). Plaintiff was, upon information and believe the most qualified candidate by experience and education but she was not offered this position and such position was changed to a non senior level position.
14. Upon her second anniversary and eligibility for general promotion (June of 2017) Plaintiff was again denied a promotion.
15. Plaintiff, unable to have her issues and concerns addressed, filed an EEO charge based on racial and retaliatory discrimination.
16. Plaintiff continued to apply for positions/opportunity and promotions which would hopefully allow her to move up in the organization commensurate with other similarly situated employees.



17. Plaintiff continued to be denied positions, open for application, for which she was well qualified and lost the positions to less qualified white employees.

**FOR A FIRST CAUSE OF ACTION/(VIOLATION OF 42 U. S. C. §2000e, /Retaliation)**

18. Plaintiff incorporates by reference paragraphs 1 through 17 as though fully set forth herein.
19. During all relevant times herein, Plaintiff and Defendant satisfied the Title VII definition of employee and employer.
20. Plaintiff reported to her employer that she was concerned there was or may be discrimination (racial bias or disparate treatment on that basis) to senior managers. No actions were taken and her employment environment became much worse.
21. Such reports relating to her concern of discrimination and bias and disparate treatment were made in good faith and made with objective and subjective information.
22. Defendant failed to promote Plaintiff to positions for which she was the most qualified because of her good faith complaints, inquiries, charges, grievances, and/or claims.
23. As a direct and proximate result of the failure to promote and due to Defendant's reckless, willful and intentional acts of discriminatory treatment and retaliation, Plaintiff has experienced severe emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, embarrassment, humiliation, increased medical expenses, past, present and future loss of income, and other economic and non-economic damages including direct and consequential damages.
24. Plaintiff has no plain, adequate or complete remedy at law to correct Defendant's unlawful discrimination and seeks injunctive relief as his only means of securing full relief from Defendant's unlawful conduct.

**WHEREFORE**, Plaintiff requests that this Court:

- A. Award Plaintiff backpay, with interest thereon, from the date of discharge until the Plaintiff is restored to a rightful position with commensurate wages and benefits;
- B. Award Plaintiff compensatory and punitive damages in an amount to be determined by a jury, but not less than \$300,000 pursuant to 42 U. S. C §1981a for Defendant's discriminatory conduct, race discrimination and retaliation, against her;



- C. Permanently enjoin Defendant, their agents, officers and employees from engaging in all practices found by this Court to be in violation of 42 U. S. C. §2000e *et. seq.*;
- D. Award Plaintiff the costs and disbursements of this action, including reasonable attorney's fees, pursuant to 42 U. S. C. §1988 and 2000e-5 (k);
- E. Award such other and further relief as this Court may deem just and proper.

**FOR A SECOND CAUSE OF ACTION/(VIOLATION OF 42 .S.C.§2000e and 42 U.S.C. §1981 Race Discrimination)**

- 25. Plaintiff incorporates by reference paragraphs 1 through 24 as though fully set forth herein.
- 26. Plaintiff is an African American (Black American). At all relevant times herein, Plaintiff and Defendant satisfied the Title VII definition of employee and employer.
- 27. Plaintiff was treated by her manager in a disparate manner as opposed to similarly situated white employees. Plaintiff notified her employer of such disparate treatment.
- 28. Plaintiff was denied general and specific promotions for which she was well qualified without cause, upon information and believe, in whole or in causative part because she was African American. Such denials, based on race, discriminate in contract.
- 29. Such failure to promote and allow Plaintiff to move up as other similarly situated employees have within the organization is an adverse employment action under the law and caused damages recognized by the Act.
- 30. Plaintiff has no plain, adequate or complete remedy at law to correct Defendant's unlawful discrimination and seeks injunctive relief as his only means of securing full relief from Defendant's unlawful conduct.

**WHEREFORE, Plaintiff requests that this Court:**

- A. Award Plaintiff backpay, with interest thereon, from the date of discharge until the Plaintiff is restored to a rightful position with commensurate wages and benefits;
- B. Award Plaintiff compensatory and punitive damages in an amount to be determined by a jury, but not less than \$300,000 pursuant to 42 U. S. C §1981a for Defendant's discriminatory conduct, race discrimination and retaliation, against her;
- C. Permanently enjoin Defendant, their agents, officers and employees from engaging

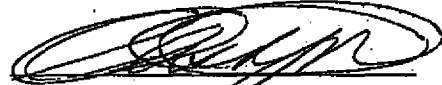
in all practices found by this Court to be in violation of 42 U. S. C. §2000e *et. seq.*;

D. Award Plaintiff the costs and disbursements of this action, including reasonable attorney's fees, pursuant to 42 U. S. C. §1988 and 2000e-5 (k);

E. Award such other and further relief as this Court may deem just and proper.

Shannon Ashford  
22 New Holland Circle  
Columbia, SC 29203

(857) 753-0539



Shannon Ashford

November 29, 2017